

Docket Optical System - Docket No.09-IEP-IE

From: "Arlene Farol" <AFarol@aqmd.gov>
To: <docKET@ENERGY.STATE.CA.US>
Date: 9/3/2009 4:47 PM
Subject: Docket No.09-IEP-IE

September 2, 2009

California Energy Commission
Dockets Office, MS-4
Re: Docket No. #09-IEP-1E
1516 Ninth Street
Sacramento, CA 95814-5512

Via E-mail: docket@energy.state.ca.us

Attention: Docket No. #09-IEP-1E

Re:
Comments of
South Coast
Air Quality
Management
District staff
regarding
California
Energy
Commission
(CEC) Draft
Staff Report
for the
Comparative
Costs of
California
Central
Station
Electricity
Generation
Technologies

Thank you for the opportunity to comment on Draft Staff Report for the Comparative Costs of California Central Station Electricity Generation Technologies. The report presents extensive cost estimates for 21 electricity generation technologies. SCAQMD staff compliments the authors for providing such comprehensive and detailed cost estimates. Staff offers the following comments for your consideration.

It is unclear whether the report has addressed the cost impacts of environmental externalities

DOCKET 09-IEP-1E
DATE <u>9/2/2009</u>
RECD. <u>9/3/2009</u>

during construction of these technologies. Environmental externalities include potential adverse impacts on air quality, energy, geology and soil, hazard and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, transportation and traffic.

There may be costs associated with carbon capture and sequestration, and there are purchases of offsets required for operation of the coal-integrated gasification combined cycle technology. According to the report (page 9), the cost of carbon capture and sequestration was not included, and it is unclear whether the cost of offsets were accounted for.

Thank you for
the
opportunity to
comment. If
you have any
questions
about these
comments or
need
additional
information,
please contact
Jill Whynot,
Director of
Strategic
Initiatives, at
(909) 396-
3104.

Sincerely,

Elaine Chang, DrPh

EC:JW:SD:af